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Federal Communications Commission  
Office of Secretary

February 6, 2006

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc., Inc.  
236 Massachusetts Avenue, N.E. Suite 110  
Washington, DC 20002

**Re: Certification of CPNI  
EB Docket No. 06-36  
EB-06-TC-060**

**CPNI Compliance Certification for**

**Guadalupe Valley Telephone Cooperative, Inc. - FCC 499 Filer ID 804603  
Guadalupe Valley Communications Systems, L. P. - FCC 499 Filer ID 818266**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

Attachment

Copies: 4 additional copies to Secretary  
Byron McCoy, Telecommunications Consumers Division  
Best Copy and Printing (BCPI)

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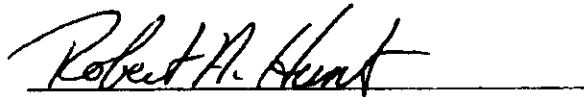
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**Guadalupe Valley Telephone Cooperative, Inc. - FCC 499 Filer ID 804603**  
**Guadalupe Valley Communications Systems, L. P. - FCC 499 Filer ID 818266**

36101 FM 3159, New Braunfels, TX 78132-1604 (830) 885-4411

**CERTIFICATION**

I am Vice President-Regulatory Affairs & Corporate Development of Guadalupe Valley Telephone Cooperative, Inc. and Guadalupe Valley Communications Systems, L. P. On behalf of Guadalupe Valley Telephone Cooperative, Inc., an ILEC operating in Texas and its affiliate Guadalupe Valley Communications Systems, L. P., a toll-reseller operating in Texas (collectively "Guadalupe Valley") I hereby certify that I have personal knowledge that Guadalupe Valley is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.<sup>1</sup> Accompanying this certificate is a statement explaining how Guadalupe Valley is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Robert A. Hunt  
Vice President-Regulatory Affairs & Corporate  
Development  
Guadalupe Valley Telephone Cooperative, Inc.  
Guadalupe Valley Communications Systems, L. P.

February 1, 2006

Attachment

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<sup>1</sup> 47 C.F.R. §§ 64.2001-2009.

**Guadalupe Valley Telephone Cooperative, Inc. - FCC 499 Filer ID 804603**  
**Guadalupe Valley Communications Systems, L. P. - FCC 499 Filer ID 818266**

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**STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Guadalupe Valley Telephone Cooperative, Inc., an ILEC operating in Texas and its affiliate Guadalupe Valley Communications Systems, L. P., a toll-reseller operating in Texas (collectively known as the "Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any segregation or refinement based on CPNI.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Company that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.

**5. Customer Notification and Authorization Process**

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the Company undertakes to use CPNI for marketing and provides of written notification, the Company's notification will comply with the requirements of the FCC's CPNI rules at Part 64, Subpart U, Section 64.2007(f)(2).

**6. Training**

The Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

**7. Record of Customer CPNI Approval/Non-Approval**

Prior to undertaking to use CPNI for marketing, the Company will develop a system for maintaining readily accessible record of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

**8. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

**9. Software Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

**10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.